

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
EUGENE DIVISION

RONNIE DOOLEY and THOMAS KITT,  
individually and on behalf of all others  
similarly situated

Plaintiffs,

v.

RONALD SAXTON, RODERICK C.  
WENDT, R. NEIL STUART, and JELD-  
WEN EMPLOYEE STOCK OWNERSHIP  
& RETIREMENT PLAN,

Defendants.

Case No. 1:12-CV-1207-MC  
Consolidated with Case Nos: 1:13-CV-177-  
MC & 1:13-CV-395-MC

**DECLARATION OF  
ROBERT A. IZARD**

**DECLARATION OF ROBERT A. IZARD**

Pursuant to 28 U.S.C. § 1746, the undersigned attests to the following under the penalties of perjury:

1. My name is Robert A. Izard. I am an adult over the age of 18 and am a partner in the law firm of Izard Nobel LLP.
2. My firm regularly, nearly exclusively, represents classes of plaintiffs in federal litigation. In class-action cases, we operate exclusively on a contingent fee basis.
3. All of my firm's efforts were conducted on behalf of Plaintiffs and the Class with efficiency and with cost-savings in mind. Being on a contingent fee basis, Class counsel had every incentive to undertake this massive project with an eye to flattening the learning curve and avoiding "make work" projects. Any inefficiencies would take time away from other potential revenue-generating projects.
4. Furthermore, my firm coordinated with Heffner Hurst and Cohen Milstein at all times to ensure our firms operated efficiently and did not over bill the clients in this case

for our work. Any time two or more attorneys worked on a task, it was because we concluded the task was worthy of such attention, could benefit from more than one perspective, or was labor intensive enough to justify such attention.

5. From my firm's contemporaneous time records, my firm expended the following hours in representing Plaintiffs and the Class for each timekeeper:

<b>Attorney</b>	<b>Title</b>	<b>Hours</b>	<b>Hourly Rate</b>	<b>Lodestar</b>
Robert A. Iazard	Partner	63.5	\$700	44,500.00
Mark P. Kindall	Partner	45.5	\$600	27,300.00
<b>Totals</b>		<b>109</b>		<b>71,800.00</b>

6. The rates of each timekeeper are those that are customary for an ERISA attorney of that experience. Since ERISA is practiced nationally, the rates reflect the national rates for this type of work. These are the rates billed to our regular hourly clients in the ordinary course of business.

7. My firm's total lodestar as of July 15, 2015 is \$71,800.

8. We expect to expend additional time of approximately 15 hours to complete this litigation. This includes work related to preparation of documents in support of final approval of the settlement. The total estimated lodestar for this work is less than \$10,000.

9. When I took this case, based on the state of the law, risk, and estimated duration, I understood there was a likelihood my firm might recover nothing in this case given its risky nature.

10. In any class action case, we expect to recover expenses from the recovery just as we would from any paying client.

11. My firm's expenses, necessary to the successful prosecution of this case, were \$1,098.20, itemized as follows:

- a. Travel: \$ 652.00
- b. Research charges: 27.70

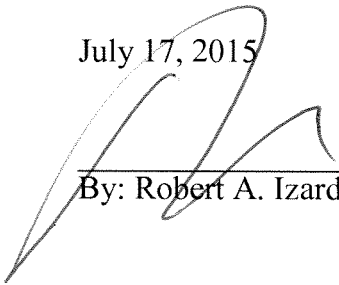
c. Postage, courier & overnight mail: \$72

d. Other related and necessary expenses: \$173.25

I declare under penalty of perjury that the foregoing is true and correct.

Executed on:

July 17, 2015



By: Robert A. Izard